

Robert J. Tolchin

From: Robert Tolchin <rjt.berkman@gmail.com>
Sent: Monday, October 22, 2012 11:28 AM
To: Hill, Brian; Rachel Weiser
Cc: Rochon, Mark; Hibey, Richard; M Haller
Subject: Re: Sokolow

Brian -

I am informed that the Arabic-language documents you produced yesterday in Shatsky contain several prisoner files. Please explain why you are purportedly unable to find Noor's prisoner file, when you found and produced such files in Klieman and Shatsky, and please explain what search, if any, you have made for Noor's file, and how that purported search differs from the successful searches you conducted for these files in Shatsky and Klieman.

- Bob

On Fri, Jul 6, 2012 at 6:39 AM, Hill, Brian <BHill@milchev.com> wrote:

Bob,

As I told Mr. Haller during our last meet and confer call, we have searched for but been unable to locate the documents you describe in item 2 below.

I have made further inquiries as I told Mr. Haller I would, but we still have not been able to locate the documents you describe in item 2 below.

Regards,

Brian A. Hill
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From: Robert Tolchin [mailto:rjt.berkman@gmail.com]
Sent: Friday, July 06, 2012 3:49 AM

To: Hill, Brian; Rochon, Mark; Hibey, Richard

Cc: M Haller

Subject: Re: Sokolow

Brian -

Over a month has passed without any response to item # 2 in my email below. Please provide a response immediately, or I will have to bring this matter to the attention of the Court.

- Bob

On Sun, Jun 3, 2012 at 11:29 AM, Robert Tolchin <rjt.berkman@gmail.com> wrote:

Counselors -

1) I am still awaiting your response to the email below.

2) Reading over the transcript of the Jawad Amawi deposition in *Klieman* that you have produced, I see that the PA Prisoner Ministry has a paper application form and file for each prisoner. *Id.* at pp. 51; 64. That form and file are clearly responsive to the Sokolow Plaintiffs' RPD 3(i) (which seeks "*All documents concerning all payments made to and all benefits provided to Noor and/or his relatives by the PA and PLO at any time after January 27, 2002, in relation to, as a result of, or due to his arrest/imprisonment by Israel*") -- but they have not been produced.

Please advise immediately whether the PA will produce the Prsioner Ministry's paper application form and file for Noor, and if so when.

- Bob Tolchin

On Fri, Jun 1, 2012 at 12:00 PM, Robert Tolchin <rjt.berkman@gmail.com> wrote:

Counselors -

We would like to meet and confer about the production we just received from you in Sokolow, prior to seeking relief from the court in respect thereto. When early next week are you available?

- Bob